

Hecla Mining Company

Boise, Idaho

Attn: Paul Glader, Environmental Manager

Re: Clarification of two questions posed by Mike Schierman, ERG consultant to Hecla on the Johnny M Site Investigation Report for the Administrative Order on Consent(AOC) between EPA and Hecla

Dear Mr.Glader:

We have received an email from Mike Schierman concerning comments submitted to Hecla concerning the Site Investigation Report Document that was presented to EPA for the AOC.

Questions and Responses

- 1) Remove the ITASCA report (Appendix I) from the SIR

Response: This document may be submitted as separate reference document deliverable, but not as part of the SIR since groundwater was specifically not addressed in the agreed scope of the SIR.

- 2) Soil cleanup levels.

Response: Any contemplated mitigative actions (non-time critical removal) for this Site will be subject to a CERCLA risk standards of 1×10^{-4} or approximately 3.5 pCi/g Ra-226, inclusive of background. This clean-up level and associated equivalencies are outlined and discussed in detail in OSWER Directive 9200.4-18 dated August 22, 1997. Further, there were some erroneous assumptions made about the use of this directive and the applicability of using UMTRCA clean-up standards as ARARs on calculating volume estimates for this Site. This directive states plainly that UMTRCA regulations can only be applied to UMTRCA sites, and at best the UMTRCA regulations can be viewed as relevant and appropriate requirements (RAR) on UMTRCA like sites. As agreed and stipulated in the AOC between Hecla and EPA 6, this is not an UMCTRA or UMCTRA like Site rendering this a moot point. The volumes of soil will need to be recalculated using the aforementioned CERCLA cleanup level.

If you have any questions or comments do not hesitate to contact me at 214-665-6789.

Sincerely ,

Jon Rinehart

On Scene Coordinator

CC: Mike Schierman, ERG